

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
Ana Flores, Rene Flores, Maria Magdalena  
Hernandez, Magali Roman, Make the Road  
New York, and New York Communities for Change,

Plaintiff,

**ANSWER**

Docket No.: 18-CV-3549

-against-

*(Electronically Filed)*

Town of Islip, Islip Town Board, Suffolk County  
Board of Elections,

Defendants.

-----X

Defendant, Suffolk County Board of Elections, by its attorney, DENNIS M. BROWN,  
Suffolk County Attorney, by LEONARD G. KAPSALIS, Assistant County Attorney, answering  
plaintiff's Complaint, respectfully:

1. Avers that the allegations contained in the paragraph numbered "1" of the  
complaint characterize the legal action being brought and purport to invoke the jurisdiction of the  
Court pursuant to the enumerated statutes and, as such, make no answer save to demand strict  
proof thereof and to deny any conduct giving rise to any cause of action thereunder.

2. Denies knowledge or information sufficient to form a belief as to the allegations  
contained in the paragraphs numbered "2," "3," "4," "5," "6," "7," "8," "9," "10," "11," "12,"  
"14," "15," "16," "17," "18," "19," "20," "21," "22," "23," "24," "25," "26," "27," "29," "30,"  
"31," "32," "33," "34," "35," "36," "37," "38," "39," "40," "41," "42," "43," "44," "45," "46,"  
"47," "48," "49," "50," "51," "52," "53," "54," "55," "56," "57," "58," "59," "60," "61," "62,"  
"63," "64," "65," "66," "67," "68," "69," "70," "71," "72," "73," "74," "75," "76," "77," "78,"  
"79," "80," "81," "82," "83," "84," "85," "86," "87," "88," "89," "90," "91," "92," "93," "94,"

“95,” “96,” “97,” “98,” “99,” “100,” “101,” “102,” “103,” “104,” “105,” “106,” “107,” “108,” “109,” “110,” “111,” “112,” “113,” “114,” “115,” “116,” “117,” “118,” “119,” “120,” “121,” “122,” “123,” “124,” “125,” “126,” “127,” “128,” “129,” “130,” “131,” “132,” “133,” “134,” “135,” “136,” “137,” “138,” “139,” “140,” “141,” “142,” “143,” “144,” “145,” “146,” “147,” “148,” “149,” “150,” “151,” “152,” “153,” “154,” “155,” “156,” “157,” “158,” “159,” “160,” “161,” “162,” “163,” “164,” “165,” “166” and “167” of the complaint.

3. The allegations contained in paragraph numbered “13” of the complaint set forth a request for relief and to the extent that a response is required, the defendant denies knowledge or information sufficient to form a belief as to those allegations.

4. Denies knowledge or information sufficient to form a belief as to the allegations contained in the paragraphs numbered “28” of the complaint except admits that the Suffolk County Board of Elections is responsible for the administration of elections in accordance with New York State Election Law.

**AS AND FOR A RESPONSE TO COUNT I**

5. Answering the paragraph numbered “168” of the complaint, repeats, reiterates and realleges each and every response to the recited paragraphs, with the same force and effect as if the same were set forth at length herein.

6. Denies knowledge or information sufficient to form a belief as to the allegations contained in the paragraphs numbered “169,” “170” and “171” of the complaint

7. Avers that the allegations contained in the paragraph numbered “172” of the complaint characterize the legal action being brought and purport to invoke the jurisdiction of the Court pursuant to the enumerated statutes and, as such, make no answer save to demand strict proof thereof and to deny any conduct giving rise to any cause of action thereunder.

WHEREFORE, defendant demands judgment against the plaintiffs dismissing the complaint, together with the costs, disbursements and reasonable attorneys' fees of this action, and for such other and further relief as this Court deems just and proper.

Dated: Hauppauge, New York  
August 10, 2018

Yours, etc.,

DENNIS M. BROWN  
Suffolk County Attorney

*s/Leonard G. Kapsalis*  
LEONARD G. KAPSALIS  
Assistant County Attorney  
*Attorney for Defendant,*  
*Suffolk County Board of Elections*  
H. Lee Dennison Building  
100 Veterans Memorial Highway  
Hauppauge, N.Y. 11788-0099  
631-853-4851